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September 24, 2018

Honorable Judge Brenda K. Sannes
Federal Building and U.S. Courthouse
P.O. Box 7345
Syracuse, 13261-7345
Via ECF

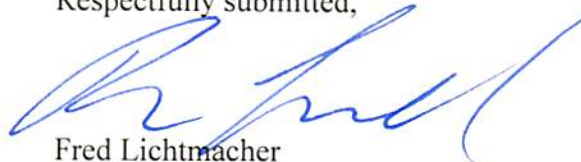
Re: Elijah Johnson v. City of Syracuse et. al. 16-CV-0622

Your Honor:

I represent the plaintiff in the above-entitled civil rights matter. I write in response to the defendants' letter dated September 24, 2018 and plaintiff continues to oppose the defendants' somewhat mysterious application.

With the defendants' second letter they still do not inform as to who the mystery witness is. If the defendants were to reveal this information, rather than sending cryptic letters, plaintiff could make a factually detailed argument against said application which would in turn, allow the Court to make a better informed decision. In my decades of litigating I have found that lawyers who do not want to reveal the most basic information usually are hiding what would expose an argument as not meritorious. Under these circumstances, with the disruption this would cause to my client's, my witness's, this attorney's and doubtless the Court's schedules, this application must be denied. I would like to note further, that the longer the trial date is even in question, the more disruptive even the possibility of an adjournment becomes, as for this office, scheduling other trials and depositions becomes problematic.

Respectfully submitted,



Fred Lichtmacher

cc: Christina F. DeJoseph, Esq.
Assistant Corporation Counsel
via ECF